

MARK E. FERRARIO, ESQ.
Nevada Bar No. 1625
TYLER ANDREWS, ESQ.
Nevada Bar No. 9949
MATTHEW P. HOXSIE, ESQ.
Admitted Pro Hac Vice
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: ferrariom@gtlaw.com
tyler.andrews@gtlaw.com
hoxsiem@gtlaw.com

Counsel for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL VALENTINI and DALLACE
BUTLER, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

READING INTERNATIONAL, INC.,
Defendant.

Case No.: 2:24-cv-00255-RFB-MDC

**JOINT MOTION AND
[PROPOSED] ORDER TO
EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION AND
TO SET DEADLINE FOR
PLAINTIFFS TO FILE REPLY**

Defendant Reading International, Inc. ("Defendant" or "Reading") and Plaintiffs Daniel Valentini and Dallace Butler ("Plaintiffs"), by and through their undersigned counsel, hereby move to extend Defendants' deadline to respond to Plaintiffs' Motion for Class Certification, filed on October 17, 2024, and to set the deadline for Plaintiffs to file their reply in support. This motion is made for good cause and not to delay the proceedings.

The deadline for Defendant to respond is currently set for November 1, 2024. Defendant's counsel has conflicting briefing deadlines and depositions occurring this week, as well as depositions set next week, and pre-planned travel by one counsel, in addition to briefs that were

1 due last week in unrelated matters. For these reasons, Defendant moves to extend its deadline to
 2 respond from November 1, 2024 to **November 22, 2024** to accommodate its conflicting deadlines.

3 Defendant has conferred with Plaintiffs' counsel, who consents to the request, but noted
 4 that it will be out-of-office in addition to the Thanksgiving holiday, and requests that its deadline
 5 to file its reply in support of class certification be set for **December 13, 2024**. Defendant consents
 6 to Plaintiffs' request.

7 For these reasons, the parties jointly request the Court set the following briefing schedule
 8 on the motion for class certification:

9 Defendants' response shall be due **November 22, 2024**.

10 Plaintiffs' reply shall be due **December 13, 2024**.

11 DATED this 29th day of October, 2024

12 **THE SIMON LAW FIRM, P.C.**

GREENBERG TRAUIG, LLP

13 By: /s/ Jeremiah W. Nixon

13 By: /s/ Tyler Andrews

14 Anthony G. Simon, Esq.
 15 *Admitted Pro Hac Vice*
 16 Jeremiah W. Nixon, Esq.
 17 *Admitted Pro Hac Vice*
 18 800 Market Street, Suite 1700
 19 St. Louis, Missouri 63101

14 Mark E. Ferrario, Esq.
 15 Nevada Bar. No. 1625
 16 Tyler Andrews, Esq.
 17 Nevada Bar No. 9499
 18 Matthew P. Hoxsie, Esq.
 19 *Admitted Pro Hac Vice*
 20 10845 Griffith Peak Drive, Suite 600
 21 Las Vegas, NV 89135

18 Robert T. Eglet, Esq.
 19 Nevada Bar No. 3402
 20 Erica D. Entsminger
 21 Nevada Bar No. 7432
 22 **EGLET ADAMS EGLET HAM**
 23 **HENRIOD**
 24 400 South Seventh Street, Suite 400
 25 Las Vegas, NV 89101

*Attorneys for Defendant Reading
 International*

22 *Attorneys for Plaintiffs and the Classes*

24 **IT IS SO ORDERED:**

25 

26 UNITED STATES DISTRICT JUDGE

27 Dated: October 30, 2024

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that, a true and correct copy of the foregoing *Joint Motion and [Proposed] Order to Extend Time for Defendant to Respond to Plaintiffs' Motion for Class Certification and to Set Deadline for Plaintiffs to File Reply* was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

DATED this 29th day of October 2024.

/s/ Andrea Lee Rosehill

An employee of GREENBERG TRAURIG, LLP